

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

NEXSTAR MEDIA, INC. d/b/a KFOR-TV, et al.,

Plaintiffs,

v.

RYAN WALTERS, et al.,

Defendants.

Case No. 5:24-cv-00980-J

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' WITNESSES AND EXHIBITS

Plaintiffs filed a Motion in Limine on Wednesday seeking to exclude specific topics and evidence that Defendants intend to offer at trial that are irrelevant, disproportionate and harassing. [Doc. 46]

Plaintiffs seek the exclusion of the following witnesses and documents based on the arguments in that motion. The exclusions requested will be listed under the heading of each argument advanced in the motion.

1. An alleged August 22, 2024 incident in which KFOR personnel entered the public restroom at the Oliver Hodge Building after being asked to do so by a member of the public;

W.3 Ethan Worley

W.4 Lila Miranda Randol-Rossouw

W.5 Steven Cameron

W.6 Kim Brentlinger (limitation of testimony)

- E.4 Ethan Worley Decl.
- E.5 Lila Miranda Randol-Rossouw Decl.
- E.6 Steven Cameron Decl.

The facts surrounding an individual attempting to get KFOR to report on the status of changing tables in public restrooms in Oliver Hodge Building is not at all germane to this case. This evidence is being offered merely to sensationalize the trial.

2. Specific KFOR news stories Defendants contend support their claims that Plaintiffs report stories that are “false” or “inaccurate;”

W.8 Natalie Hughes

- E.1 Journalistic Code of Ethics
- E.2 Journalistic Integrity
- E.17-E.52, E.54 KFOR Articles

The veracity of KFOR’s reporting is not on trial. Specific evidence about KFOR’s market share, profits, damages are not relevant to this case seeking injunctive relief and nominal damages. Ms. Hughes lacks first-hand, personal knowledge of the facts surrounding the denial of access.

3. Witnesses Perry Sook (W.7) and Lisa Taylor (W.12);

These individuals work and reside out of state. They do not work at KFOR, but for the corporate headquarters. They possess no personal knowledge relevant to this case. The topics on which their testimony is sought have no bearing on this case.

Respectfully submitted:

Dated: December 6, 2024

/s/ Charles Miller

Charles Miller*

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Courtney Corbello*

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**admitted pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing, which will transmit a Notice of Electronic Filing to all ECF registrants of record in this matter.

/s/ Charles Miller

Charles Miller*